

DEBRA R. TORRES-REYES

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Attorney for Mr. Ivan Antonio Flores

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. IRMA E. GONZALEZ)**

UNITED STATES OF AMERICA,)	Criminal Case No.07CR-3279-IEG
)	
Plaintiff,)	MOTION TO SHORTEN TIME
)	TO FILE DEFENDANT'S
v.)	SENTENCING SUMMARY CHART
)	AND EXHIBIT
IVAN ANTONIO FLORES,)	
)	
Defendant.)	DATE: April 21, 2008
)	TIME: 2:00 p.m.
)	CTRM: 4th , 1

The defendant, IVAN ANTONIO FLORES, by and through counsel, Debra R. Torres-Reyes, moves this Court for an order shortening time to file Defendant's SENTENCING SUMMARY CHART AND SENTENCING EXHIBIT on today's date , April 16, 2008. Said documents were due to be filed on Monday, April 14, 2008 .

Counsel has been waiting for additional sentencing documents and has only received one document to date. Mr. Flores' Sentencing Summary Chart and Sentencing Exhibit do not require a response from United States Attorney's Office nor U.S. Probation, thus neither are not prejudiced by the late filing.

Respectfully submitted,

Dated: April 16, 2008

/s Debra R. Torres-Reyes

Debra R. Torres-Reyes

Attorney for Defendant Ivan Antonio Flores

PROOF OF SERVICE

I, Debra R. Torres-Reyes, declare as follows:

I am a citizen of the United States and employed in the City of San Diego, California. I am over eighteen years of age. My business address is 1901 First Ave., First Floor San Diego, California, 92101.

I am not a party to the above entitled action.

On April 16, 2008, I hereby caused service of Defendant's Ex parte Motion to Shorten Time to File Sentencing Summary Chart and Exhibit by Electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them and to the United States Attorney's Office for The Southern District of California at efile.dkt.nes@usdoj.gov.

I declare under penalty of perjury that the foregoing is true and correct.

April 16, 2008

/s/DebraR. Torres-Reyes
Debra R. Torres-Reyes
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